

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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|---------------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Criminal No. 04-10194-RCL |
| |) | |
| ANTHONY BUCCI, |) | |
| DAVID JORDAN |) | |
| FRANCIS MUOLO |) | |
| Defendants. |) | |

Government's Assented-to Motion for Enlargement of Time

The United States of America, by and through Assistant United States Attorney John T. McNeil, respectfully submits this assented-to motion for an enlargement of time – until June 6, 2005 – to file its responses to the defendants' various pretrial motions.

On May 6, 2005, Defendant Bucci filed a motion to suppress certain physical evidence discovered in his automobile which was seized at the time of his arrest, and to suppress statements he made to officers after his arrest. [D.130, D.131, D.132]. On the same day Defendant Bucci filed a motion to sever his trial from that of his co-defendants. [D.128, D.129]. On May 7, 2005, Defendant Muolo filed a motion to suppress statements he made to law enforcement officers in an interview two days before his arrest, and statements he made to officers on the date of his arrest. [D.134, D.135]. On the same day, Defendant Muolo filed a motion to sever his trial from that of his co-defendants. [D.136, D.137]. On May 9, 2005, Defendant Jordan filed a motion (dated May 5, 2005) to sever his trial from that of his co-defendants. [D.138].

The government's responses to these motions are currently due on May 20 and 23, 2005. Because of the number and complexity of these motions, the government respectfully moves for an enlargement of time – until June 6, 2005 – to file its responses to these motions. The

defendants, through counsel, have each assented to this motion.

Respectfully Submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

Date: May 19, 2005

By: /s/ John T. McNeil

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